

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

JUN 10 2015

PATRICK KEANEY
By Clerk, U.S. District Court
Deputy Clerk

Christel Renee Helem, Plaintiff(s)
(Full Name)

v.

Ok Dept. of Human
Services, Defendant(s)

Pittsburg & McIntosh Co.

Case No. CIV 15-216-RAW
(To be supplied by the Clerk)

COMPLAINT

A. PARTIES

1) Christel Helem, is a citizen of Oklahoma
(Plaintiff) (State)

who presently resides at 2800 N. Pine, McAlester, Ok 74501
(mailing address, if different from residence)

2) Defendant Jo Ann Benson is a citizen of
(Name of first defendant)
McAlester, Ok, and is employed
(City, State)
as Administrative Tech IV - Supervisor Immediate
(Position and title, if any)

3) Defendant Teresa May is a citizen of
(Name of second defendant)
McAlester, Ok, and is employed
(City, State)
as Administrative Assistant - Supervisor
(Position and title, if any)

[You may attach additional pages (8½" x 11") to furnish the above information for additional defendants.]

4) Defendant Sharlene Ballard - Child Welfare Worker
Birmingham, Ok

B. JURISDICTION

- 1) Jurisdiction is asserted pursuant to

C. NATURE OF CASE

- 1) Briefly state the background of your case. Equal Employment Opportunity

D. CAUSE OF ACTION

I allege the following:

- 1: Discrimination on the basis of EEO.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

- 2: Failure to train

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

3. Negative adverse actions on performance evaluations and other areas related to work.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

4) Unequal treatment

[If necessary, you may attach additional pages (8½" x 11") to explain any allegation or to list additional supporting facts in the same format as above.]

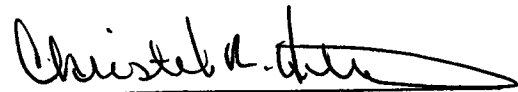
E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief: Monetary & Punitive
Damages According to BECC law a minimum of
\$900,000.00.

Current Address: 2800 N. Pine

Mustache, Ok 74501

Telephone: 918.820.0855



Original Signature of Plaintiff

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Christel R. Helem
P.O. Box 516
Mcalester, OK 74502

From: Oklahoma City Area Office
215 Dean A. McGee Avenue
Suite 524
Oklahoma City, OK 73102



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

564-2014-00729

Wendy L. Trefethren, Investigator

(405) 231-5623

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission
3/16/2015

Enclosures(s)

W. Trefethren
Holly Waldron Cole, Area Office Director

3/16/2015
(Date Mailed)

cc:

William T. Drapala
JD SPHR Office of Civil Rights
OKLAHOMA D.H.S.
P.O. Box 25352
Oklahoma City, OK 73125